

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN

ESTATE OF RYLAN AISLEE)
KOOPMEINERS, ET AL,)
Plaintiffs,)
and)
) Civil Case No. 14-CV-1115
BLUE CROSS BLUE SHIELD)
OF WISCONSIN, ET AL)
Involuntary Plaintiffs,)
v.)
SARAH GUMM, ET AL.,)
Defendants.)

**JOINT STIPULATION AND AN ORDER UNDER FAIR CREDIT REPORTING ACT
(FCRA), 15 U.S.C. SEC.1681**

The Plaintiffs, ESTATE OF RYLAN AISLEE KOOPMEINERS by her personal representative and natural parent, NATHAN KOOPMEINERS, and her natural parents, NATHAN KOOPMEINERS and REGGAN KOOPMEINERS, by their attorneys, Rizzo & Diersen, S.C. by Gail C. Groy and W. Erich Scherr, Scherr and Scherr, LLP and the Defendants, SARAH GUMM (aka SARAH RACHONER AND SARAH KOEHN) by her attorney Jed Stone of Stone & Associates (collectively “the parties”) hereby stipulate to the issuance of an Order as required by the Fair Credit Reporting Act (FCRA) 15 U.S.C. Sec. 1681 et Seq for the release of the Consumer reports and related documents relating to SARAH GUMM (aka SARAH RACHONER and SARAH KOEHN). In support thereof, Plaintiffs state:

1. On July 29, 2015, Plaintiffs served a subpoena on a company that CARE.COM identified to the Plaintiffs that performed their background/verification checks at the

time of the incident that is in litigation. This company was identified as Sterling Infosystems.

2. On September 9, 2015, Sterling Infosystems by their attorney Pamela Q. Devata of Seyfarth Shaw LLP responded and objected to disclosure of the consumer reports and requested documents stating they were prohibited from providing the documents under the Fair Credit Reporting Act (FCRA) 15 U.S.C. Sec. 1681 et. Seq. - permissible purpose. Responsive answers to the Subpeona included:

“if we receive either a written authorization from Gumm or a court Order authorizing Sterling Infosystems to produce such documents - which are both permissible under the FCRA.”

5. The parties agree to a Order as required by the Fair Credit Reporting Act (FCRA) 15 U.S.C. Sec. 1681 et. Seq, to the release of the Consumer reports and related documents relating to SARAH GUMM (AKA SARAH RACHONER AKA SARAH KOEHN).

WHEREFORE, for the reasons stated above, Plaintiffs respectfully request that the Court grant this joint Stipulation to grant an Order as required by the Fair Credit Reporting Act (FCRA) 15 U.S.C. Sec. 1681 et Seq for the release of the Consumer reports and related documents relating to SARAH GUMM (aka SARAH RACHONER and SARAH KOEHN), and enter an Order in the form attached hereto.

Respectfully submitted,

RIZZO & DIERSEN SC

Dated: 11/25/2015

By: /s/ Gail C. Groy

GAIL C. GROY
State Bar Number: 1084553
Rizzo & Diersen SC
600 W. Verona Avenue
Verona, WI 53593
PHONE: 608-709-5565
FAX: 608-237-2247
gcg@rizzolaw.com

SCHERR & SCHERR, LLP

Dated: 11/25/2015

By: /s/ W. Erich Scherr

W. ERICH SCHERR
State Bar Number: 1031423
Scherr & Scherr, LLP
230 W. Wells St., Ste. 610 Milwaukee,
WI 53203
PHONE: 414- 224-0900
FAX: 414- 755-2741
escherr@scherr-law.com

STONE & ASSOCIATE.

Dated: 11/25/2015

By: /s/ Jed Stone

JED STONE
State Bar No. 2745127
Stone & Associates.
415 W. Washington Street,, Suite 107
Waukegan, IL 60085
PHONE: 847-336-7888
FAX: 847-336-0733
Jstone@jedstone.com